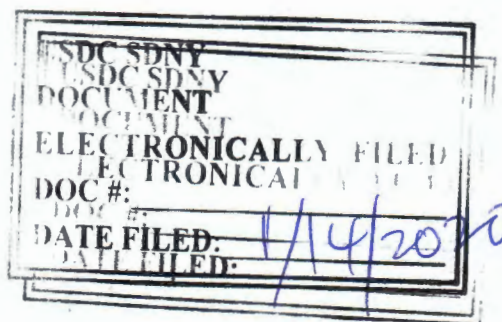


GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Orin Snyder
Direct: +1 212.351.2400
Fax: +1 212.351.6335
OSnyder@gibsondunn.com



January 10, 2020

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *THK Private Equities, LLC v. WFD Ventures LLC*, No. 19-cv-8780 (AKH)

Dear Judge Hellerstein:

We represent WFD Ventures LLC and William F. Doyle (collectively, "Defendants") in the above-captioned litigation. We write on behalf of all parties to respectfully request a temporary stay of the litigation. The parties are currently engaged in meaningful settlement negotiations, including the potential use of alternative dispute resolution procedures. A stay will conserve the parties' and judicial resources during this process. We propose to provide the Court with an update on the progress of the settlement negotiations in 30 days.

The only deadline pending in this action is Defendants' deadline to answer or otherwise respond to the Complaint. Defendants had previously made two requests for an extension of their time to answer or otherwise respond to the Complaint, (Dkts. 17, 20), which the Court granted, (Dkts. 18, 21). All parties consent to the current request for a temporary stay of the litigation.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Orin Snyder
Orin Snyder

*To accommodate the interest
to settle, the time for defendants to
answer or move is enlarged to
Feb. 28, 2020, with leave to apply
for a further enlargement.
1-14-2020
[Signature]*